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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to file her response to Plaintiff's Motion for Reversal/Remand be extended from April 1, 2019 to May 1, 2019. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) was out of the office for 2 ½ weeks with the flu/pneumonia. Counsel was also subsequently out due to her ongoing chronic migraines. Counsel also has over 80+ active social security matters, which require two or more dispositive motions per week until mid-May. Due to unexpected leave and heavy workload, Counsel for Defendant respectfully requests additional time to respond to the issues raised in

1 Plaintiff's Motion. Defendant apologizes for the belated request for extension, but had personal  
2 family emergency and sought and filed an extension of time as soon as reasonably practicable. The  
3 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

4 Respectfully submitted,

5 Dated: April 1, 2019

6 /s/ Joshua Harris  
(\*as authorized by email on April 1, 2019)  
7 JOSHUA HARRIS  
Attorney for Plaintiff

8 Dated: April 1, 2019

9 NICHOLAS A. TRUTANICH  
10 United States Attorney  
11 DEBORAH LEE STACHEL  
12 Regional Chief Counsel, Region IX  
Social Security Administration

13 By /s/ Tina L. Naicker  
14 TINA L. NAICKER  
15 Special Assistant U.S. Attorney  
16 Attorneys for Defendant

17 **ORDER**

18 APPROVED AND SO ORDERED:

19 DATED: April 2, 2019

20   
21 THE HONORABLE GEORGE W. FOLEY, JR.  
22 UNITED STATES MAGISTRATE JUDGE